

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CR. NO. 3:24-CR- 170
:
v. :
: (Judge Mannion)
JOSE R. RODRIGUEZ, :
:
Defendants. :

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1
26 U.S.C. § 5861(d)
(Possession of Unregistered Firearm)

FILED
SCRANTON
JUL 09/2024
PER dw
DEPUTY CLERK

On or about March 2, 2024, in Luzerne County, within the Middle
District of Pennsylvania, the defendant,

JOSE R. RODRIGUEZ,

did knowingly and unlawfully possess a firearm, that is, a firearm
silencer, not registered to him in the National Firearms Registration
and Transfer Record.

In violation of Title 26, United States Code, Sections 5841, 5861(d)
and 5871.

THE GRAND JURY FURTHER CHARGES:

COUNT 2

18 U.S.C. § 922(g)

(Prohibited Person in Possession of a Firearm and Ammunition)

On or about March 5, 2024, in Luzerne County, within the Middle District of Pennsylvania, the defendant,

JOSE R. RODRIGUEZ,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, to wit, a Geisler Defense brand model 1917 pistol frame and 9mm ammunition and said firearm and ammunition having been shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The allegations contained in Counts 1 and 2 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d), Title 26, United States Code, Section 5872, and Title 28, United

States Code, Section 2461(c).

Pursuant to Title 18, United States Code, Section 924(d), Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 922(g), and an offense in violation of Title 26, United States Code, Sections 5841, 5861(d) and 5871, the defendant,

JOSE R. RODRIGUEZ,

shall forfeit to the United States of America any firearms, firearm parts and ammunition involved in the offense including but not limited to the following items:

- a. 10 3D printed pistol frames, no manufacture's markings, no serial number;
- b. 1 Geisler, Glock type pistol frame, no manufacturer's markings, no serial number;
- c. Pistol slides;
- d. Pistol magazines;
- e. Pistol jigs;
- f. Gun barrel;

- g. 2 3D printers;
- h. Printed parts for Ar-15 style rifles;
- i. Trigger group kits;
- j. 9mm ammunition;
- k. Various printed pistol parts; and
- l. Pistol silencer.

By virtue of the commission of the offenses charged in Counts 1 and 2 of this Indictment by the defendant,

JOSE R. RODRIGUEZ,

any and all right, title, and interest the defendant may have had in any of the property involved in or traceable to the offenses alleged in Counts 1 and 2 of this Indictment, is vested in the United States and is hereby forfeited to the United States pursuant to Title 18, United States Code, Section 924(d), Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c).

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Section 924(d), Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c).

GERARD M. KARAM
United States Attorney

Jenny P. Roberts
JENNY P. ROBERTS
Assistant United States Attorney

A TRUE BILL


FOREPERSON

7-9-24
Date